

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

FRANCO SIGNOR, LLC,

Plaintiff,

v.

CHRISTINE BUNTING;
COMPALLIANCE LLC;
MEDVAL, LLC;
RRJJ HOLDINGS, LLC; and
JOHN DOES I through X,

**WITNESS AND EXHIBIT LIST IN
SUPPORT FOR A TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Case No. 16-cv-00659

Defendants.

Pursuant to Local Rule of the United States District Court for the Western District of New York 65(b)(4), plaintiff Franco Signor, LLC (“Franco Signor”) submits the below list of witnesses and exhibits Franco Signor may present at the preliminary injunction hearing:

1. EXHIBITS TO THE DECLARATION OF JEFF SIGNOR

- a. Confidentiality and Non-Competition Agreement, executed on June 23, 2014.
- b. Resignation Letter of Christine Bunting from Franco Signor, LLC, dated July 20, 2016.
- c. Christine Bunting’s LinkedIn page identifying CompAlliance, LLC as her new employer.
- d. Franco Signor’s Violation of Non-Compete/Non-Solicitation Letter to Bunting and Franco Signor’s letter regarding Tortious Interference with Business Contract addressed to CompAlliance, both dated August 3, 2016.
- e. Letter from Jim Weir, President of CompAlliance, dated August 8, 2016, responding to Franco Signor’s August 3, 2016 Letter.

- f. Email from Bunting confirming that CompAlliance is a competitor of Franco Signor, LLC, dated April 12, 2016.
- g. Emails dated April and May of 2016 that Christine Bunting sent from her work email address to her personal email address, attaching Franco Signor's confidential and proprietary information. (Please note that the confidential and proprietary attachments have been excluded as exhibits.)
- h. CompAlliance offer and Agreement extended to Christine Bunting, dated July 11, 2016.

2. **EXHIBITS TO THE DECLARATION OF DANIEL B. MOAR**

- a. CompAlliance and MEDVAL website pages and an April 14, 2016 press release confirming that MEDVAL and CompAlliance are working together to offer clients fully integrated services for Medicare Set-Aside process.
- b. Amended Complaint, filed on August 19, 2016.
- c. Press releases relating to MEDVAL.
- d. Articles of Organization for CVM ACQUISITION, LLC.
- e. Amendments of Articles of Organization for CVM ACQUISITION, LLC to change name to MEDVAL, LLC.
- f. Articles of Amendment to the Articles of Organization of MEDVAL, LLC to change name to RRJJ HOLDINGS, LLC.

3. **WITNESSES**

- a. *John Williams.* Franco Signor anticipates that Mr. Williams will testify concerning Franco Signor's general business, services, products, and competitive strategy and Bunting's violation of Franco Signor's Confidentiality and Non-Competition Agreement.
- b. *Jeff Signor.* Franco Signor anticipates that Mr. Signor will testify concerning Franco Signor's general business, services, products, and competitive strategy, Bunting's work at Franco Signor, and Bunting's violation of Franco Signor's Confidentiality and Non-Competition Agreement.

- c. *Christine Bunting.* Franco Signor anticipates that Defendant, Christine Bunting, the party who voluntarily executed Franco Signor's Confidentiality and Non-Competition Agreement will testify.
- d. *Jim Weir.* Franco Signor anticipates that Jim Weir, President of defendant, CompAlliance will testify concerning CompAlliance acquisition of MEDVAL and the fully-integrated, single source solution that the two companies offer for the Medicare Set-Aside process.

DATED: Buffalo, New York
August 22, 2016

GOLDBERG SEGALLA LLP

s/ Daniel B. Moar
Daniel B. Moar, Esq.
Dove A.E. Burns, Esq. *pro hac vice pending*
Steven C. Capobianco, Esq. *pro hac vice pending*
Attorneys for Plaintiff
665 Main Street
Buffalo, NY 14203-1425
(716) 566-5400
dmoar@goldbergsegalla.com